

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

CIVIL ACTION NO. 05-CV-30017-MAP

CHARLES V. RYAN IV on behalf of
himself and behalf of others similarly
situated,

Plaintiffs,

v.

ROBERT J. GARVEY and PATRICK J.
CAHILLANE in their individual capacities,

Defendants.

**DEFENDANTS' ASSENTED TO MOTION TO ENLARGE TIME
TO RESPOND TO COMPLAINT**

The Attorney General, on behalf of the defendants, Robert J. Garvey and Patrick J. Cahillane (the "Defendants"), requests that this Court allow this motion to enlarge the time to respond to plaintiff's complaint until and including April 11, 2005. In support of this motion, the defendants state as follows:

1. The complaint was served on February 4, 2005. The undersigned Assistant Attorney General only recently received a copy of the complaint and needs additional time to investigate thoroughly the allegations and claims in the complaint. The complaint is allegedly brought as a class action that challenges the search policies allegedly employed at the Hampshire County Jail.

2. Plaintiff's counsel assented to the above extension to respond to the complaint.

WHEREFORE, for the above reasons, the defendants request that this Court enter an order allowing them an additional 45 days, or until and including April 11, 2005, to respond to the

complaint.

DEFENDANTS

By their attorney,

**THOMAS F. REILLY
ATTORNEY GENERAL**

By: /s/ Timothy M. Jones
Timothy M. Jones
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CERTIFICATE OF SERVICE

I, Timothy M. Jones, hereby certify that on February 18, 2005, I served a copy of the foregoing **DEFENDANTS' ASSENTED TO MOTION TO ENLARGE TIME TO RESPOND TO THE COMPLAINT** by First-Class Mail, postage prepaid, upon the following counsels of record:

Howard Friedman
Jennifer Bills
Myong J. Joun
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Timothy M. Jones